

REGIONAL PLAN FOR SMALL QUANTITY GENERATORS OF HAZARDOUS WASTE

APPENDIX P **of the San Francisco Bay Area** **Environmental Management Plan**

September 1985

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**REGIONAL PLAN FOR
SMALL QUANTITY GENERATORS
OF HAZARDOUS WASTE**

Element C

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This report constitutes Appendix P of the San Francisco Bay Area
Environmental Management Plan.

Association of Bay Area Governments
MetroCenter
Eighth and Oak Streets
Oakland, California 94604

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CHAPTER I

INTRODUCTION

This document is a follow-up to an ABAG evaluation of the disposal of hazardous wastes from small quantity generators (SQGs). For the purpose of this report, SQGs include both households and businesses generating less than 1000 kg (about 1 ton) of hazardous waste per month. Small industrial, commercial and institutional generators are faced with managing wastes containing strong acids, heavy metals, oil and grease, organic solvents, paints and pesticides. These businesses (such as painters, printers, gas stations, auto repair shops, dry cleaners, schools and public works departments) are an important part of most communities. Households also generate a wide array of hazardous wastes such as motor oil, gasoline, antifreeze, cleaners, paints, thinners, swimming pool chlorine and assorted chemicals used for hobbies, e.g. developing photos, ceramics, and fabric dyeing. Individually hazardous wastes from the SQG may not appear significant, but collectively they represent a critical waste stream when disposed of improperly.

Theoretically, in California, hazardous wastes from all businesses must be stored, treated, transported and disposed of properly. This is in contrast to Federal regulations (40 CFR 261) that presently allow generators of less than 1000 kg (about 1 ton) of hazardous waste or 1 kg of acutely hazardous waste per month to dispose of their wastes in permitted, licensed municipal or industrial solid waste facilities. The 1984 Federal Resource Conservation and Recovery Act Amendments do, however, call for standards to be promulgated by March 31, 1986, to regulate generators of less than 1000 kg/month. Both California and Federal regulations exempt household wastes.

ABAG conducted telephone interviews of 295 households in Hayward, San Rafael and San Francisco to determine home use, storage and disposal of hazardous waste. Similarly, site interviews were conducted of 67 individual businesses regarding hazardous waste management practices, knowledge of Federal and State regulations, and attitudes on alternative disposal options. Evidence of improper disposal practices in the solid waste stream and municipal wastewater were examined along with health effects to refuse collectors and disposal workers. The findings of these studies are presented in a separate report entitled "The Disposal of Hazardous Waste by Small Quantity Generators - Magnitude of the Problem," June 1985.

Next, alternative disposal programs were identified that could meet the needs of SQGs. Particular problems for local hazardous waste collection and disposal programs were also examined. These findings are presented in a second report, "Alternative Disposal Programs for Small Quantity Generators of Hazardous Waste," August 1985.

Very briefly, these studies indicate that there is a need to provide educational programs as well as convenient and economical collection services for household and business SQGs. The types and amounts of waste

received by pilot and ongoing household hazardous wastes collection programs are perhaps the greatest argument for recommending widespread establishment of such programs. However, such efforts need to be expanded to include, perhaps even more importantly, businesses. Industrial wastewater pretreatment programs are gradually preventing small businesses from disposing of hazardous wastes down the sewer, but efforts must be made to ensure these wastes are not dumped into the solid waste stream.

While the evidence is not presently overwhelming that a problem is arising at municipal landfills, further studies are needed to fully assess the effects of improper disposals from both households and businesses. Since the potential for a problem arising is substantial, it is prudent to prevent as much hazardous waste from reaching the solid waste and wastewater streams as possible. In addition, new collection programs directed at SQGs would prevent some of the incidents of on-site soil and groundwater contamination, illegal off-site dumping and injuries to refuse workers that are attributed to SQGs.

CHAPTER II

RECOMMENDATIONS

SPECIAL COMMUNITY PROGRAMS

- 1.1 All communities should ensure that ongoing collection opportunities are available for households and businesses with small amounts of hazardous waste. Guidelines for developing community collection programs are presented in Chapter III.
- 1.2 Transfer facilities need to be established throughout the Bay Area. Permanent hazardous waste transfer facilities should be located to serve several communities, and the siting of the facilities should be coordinated on a regional basis.
- 1.3 Business associations should be encouraged to establish milk run pickup services and generator cooperatives for recycling, treatment or disposing of hazardous wastes among their members.
- 1.4 Chemical distributors should be encouraged to provide hazardous waste pickup services at the same time fresh products are delivered.

COMPREHENSIVE HAZARDOUS MATERIAL/WASTE MANAGEMENT

- 2.1 Each jurisdiction should adopt a comprehensive hazardous material/waste management program. (e.g., Counties should consider entering into a Memorandum of Understanding with the State Department of Health Services to enforce California hazardous waste control laws and enabling regulations.) Such programs should identify, notify, inspect, permit and vigorously enforce regulations to ensure the proper use, storage and disposal of small amounts of hazardous materials/wastes by businesses.
- 2.2 The respective role of counties, the California Department of Health Services, and the California Waste Management Board in comprehensive solid and hazardous waste planning needs to be clarified. Provisions for household and business SQGs should be included in the planning efforts of each county.

SOLID WASTE

- 3.1 Solid waste landfill owners and operators should adopt a hazardous waste inspection and enforcement program directed at small quantity generators. Guidelines for a control program are presented in Chapter IV.

- 3.2 Special safety training should be provided to refuse collectors, disposal workers and sewage treatment plant operators regarding hazardous wastes. Such training should include hazard recognition, who to call for spill response, and stress use of available protective clothing (e.g. safety glasses, gloves).
- 3.3 Clarification and guidelines should be provided by the State Department of Health Services and Water Resources Control Board regarding the appropriate disposal of small amounts of low risk waste, balancing technical compliance and practicality.
- 3.4 Sanitary landfills should be sited and designed with an understanding that some small amounts of hazardous waste will be received. The State Water Resources Control Board should ensure that landfill monitoring programs are designed to detect small quantities of hazardous waste that may be disposed .
- 3.5 Solid waste haulers and landfill operators should notify all customers that hazardous wastes are prohibited from the solid waste stream and that generators can be held liable for improper disposal. Referral numbers for more information should be provided with these notices.

EDUCATION

- 4.1 A concise and simple "how to do it" booklet on small quantity hazardous waste management should be prepared and distributed to businesses through county inspection programs, trade associates, and private groups. This would include instructions on obtaining generator identification numbers, record keeping, filling out manifests, pretransportation requirements, contracting with licensed haulers, and options for treatment, storage and disposal.
- 4.2 The Department of Health Services should arrange to develop and provide training and educational workshops to businesses and representatives of private sector associations and groups. Information should be provided on applicable hazardous waste regulations, good housekeeping practices, alternative products, product labeling, available recycling and treatment options, alternative collection programs for business clusters and safe disposal practices.
- 4.3 Training classes should be developed and provided for staff of local governments involved in the inspection of small businesses and the enforcement of hazardous waste regulations.
- 4.4 Public education campaigns should be conducted to inform people on what hazardous wastes are, how to avoid generation of these wastes and how to properly dispose of them. (Opportunities for disposing of household waste must be provided before initiating an educational program.)

- 4.5 Educational materials on the safe use and disposal of household hazardous waste should be incorporated into primary and secondary school curricula.
- 4.6 ABAG should continue to provide a forum for hazardous waste planning and initiate SQG educational programs through the ABAG Training Institute.

RECYCLING

- 5.1 Motor oil recycling should be included in existing recycling programs. Consideration should be given to residential curbside pickup of motor oil with prearranged schedules and provision of special containers.
- 5.2 Community collection programs should arrange for the reuse of latex paints by responsible groups, such as schools, recreation departments, theater groups, artists.
- 5.3 Consideration should be given to the recycling of hazardous materials, besides oil and latex paints.

INFORMATION SERVICES

- 6.1 County Departments of Environmental Health should act as referral for inquiries regarding the proper disposal of small amounts of hazardous waste.
- 6.2 A Bay Area directory should be prepared to provide consistent guidance on the proper disposal of small quantities of hazardous waste. Input should be solicited from water quality, sewage treatment, solid waste, environmental health and air quality agencies, as well as public interest groups. The directory would be designed for use by local government staff persons, health professionals, and public interest groups.
- 6.3 The San Francisco Bay Area Regional Poison Center's Toxic Info Center should provide general guidance for the disposal of small quantities of hazardous waste and referral to County Departments of Environmental Health for schedules of local collection programs.

FURTHER STUDIES

- 7.1 Additional research activities on solid waste composition should be conducted to compare wastes from different sources, such as agricultural, suburban and urban areas, to determine what fraction of hazardous materials disposed of with solid waste is attributable to small businesses and households. These studies should also investigate whether there are variations seasonally or from day to day. Waste sampling should also be conducted as close to the source

as possible, especially for household wastes, so that trash from selected portions of collection routes could be analyzed, obviating the need to sort through compacted loads.

- 7.2 In situ landfill leachate analyses are highly advisable. This is probably the best objective measure of the potential for environmental damage from a given solid waste disposal site. If leachate analysis shows high levels of toxics, a detailed review of the hydrogeology of the site and an analysis for contamination of downstream wells should be undertaken. Thorough pilot studies of selected landfills would provide necessary information to design improved landfill monitoring programs.
- 7.3 A pilot regional collection and transportation program should be initiated for business SQGs in the Bay Area. Seed money would be required to set up the program. However, once established and operation costs determined, the program would be designed to be self-sustaining.

CHAPTER III

GUIDELINES FOR DEVELOPING A COMMUNITY COLLECTION PROGRAM FOR SMALL QUANTITIES OF HAZARDOUS WASTE

The design of a community collection program will depend on individual city and county organizational structure, administering agency, in-house technical expertise, available funds, and community support. Typical agencies/departments to be involved in developing and conducting a program include environmental health, fire, water quality control, public works, agricultural commission, solid waste, special hazardous material/waste task force, citizen groups, private hazardous waste haulers, local laboratories, and disposal companies.

The following steps are presented as a guide for local governments developing a collection program for small quantities of hazardous waste. Much of the information presented has been condensed from the Golden Empire Health Planning Center report, "Household Hazardous Waste: Solving the Disposal Dilemma," Sacramento, CA, 1984 and incorporates the California Department of Health Services "Draft Guidelines for Establishing Household Hazardous Waste Collection Programs." Inquiries regarding the adoption of final State guidelines should be directed to the DHS Program Management Section, Sacramento, CA, attention Sherri Park, (916) 324-2809.

PROGRAM FINANCING

The following types of financing mechanisms for local jurisdictions (i.e., city, county and special districts) appear to be the most feasible methods of funding community collection programs:

Service Charges

Financing can be provided from existing service charges (e.g. utilities) if a reserve fund has been accumulated or if the need is perceived as a high priority item. Alternatively, an increase in utility bills, most likely in refuse collection fees and sewer bills, can adequately fund a program at a minimal cost to residents. ABAG's survey of 295 households indicated 78% of the respondents willing to pay up to \$1/year surcharge on their refuse bill. The City of Palo Alto approved a 6 cents/month increase on both the refuse bill and sewer bill to finance their annual four-day collection program.

One way to establish permanent community collection programs is to incorporate them into local garbage company franchises. Household collection programs can be written as a contract element when seeking bids for new garbage collection franchises. The costs for these programs would then become a part of the regular solid waste service.

Solid Waste Enterprise Funds

These funds generally finance solid waste activities from fees and miscellaneous services such as leasing of land to a hazardous waste transfer and storage facility (e.g. City of San Diego). A Bay Area example is the special fund set up for cities in Alameda County to receive revenues derived from San Francisco's use of the Altamont Landfill. Monies in this account were used to pay for a community collection day in Albany.

Fees for Hazardous Material Use Permits

An increasing number of communities are adopting permit programs for businesses that use hazardous materials within their jurisdictions. These funds are used for an overall hazardous material management program that includes inspections, enforcement, and spill response activities. Such programs could be expanded to include collection services for small quantity generators.

Tipping Fees

Another justifiable source of revenue would be an increase in fees collected by solid waste landfills from waste haulers based on the tonnage of waste brought for disposal. San Bernardino County is considering a 1% raise in tipping fees to provide an ongoing program free of direct charges to participants.

User Fees

Although it is unlikely that a user fee will completely support a household collection project, it can supplement it. Costs associated with transport and disposal of hazardous wastes are generally very high and act as a disincentive for consumers who must pay the full cost. The disposal costs can be much more than the original purchase price of the product needing to be disposed of.

In ABAG's household survey, about 62% of all respondents indicated they would be willing to pay a \$2 user fee. Willingness to respond did seem to vary greatly among the communities survey.

While most programs to date have provided free services to households, fee schedules have been developed for quantities over a specified amount, for all business participants, or for users outside the designated service area. Some communities are considering charging businesses for their services at a rate that would subsidize household participants.

County Tax on Class I Disposal Facilities

Counties may levy a 10% tax on gross receipts at Class I disposal facilities located within their jurisdiction that were operating prior to May 1, 1981, and have a current hazardous waste facility permit. This

option is presently available to only a few counties. Proposed AB 16 may extend this to apply to new off site, multi-user hazardous waste facilities.

Ways to Reduce Program Costs

1. In-kind services and donations of material, equipment and labor from businesses, government and community groups have greatly reduced the cost of pilot programs. Such services have been provided not only for actual collection and disposal, but also for publicity and community education campaigns. Donations of newspaper advertising space, public service announcements, and inserts in utility bills can minimize costs as well as increase publicity. The dependability of these approaches has not been demonstrated for a permanent program.
2. In addition, discount rates (above the normal economies of scale) on supplies and disposal fees are often provided by waste haulers and disposal companies to community collection programs that are not available to private generators of hazardous wastes.
3. Recycling waste oil by giving it to a service station or by selling it directly to a commercial recycler can reduce disposal costs and potentially generate some revenue.
4. Using reconditioned DOT certified drums can reduce project costs.
5. Donating useable products (e.g. latex paints and pesticides) to responsible organizations can also minimize disposal costs.
6. EPA recently (1985) awarded Section 8001 funding under the Resource Conservation and Recovery Act to Golden Empire Health Planning Center to provide technical assistance and workshops for household hazardous waste collection programs. For details, contact Gina Purin at (916) 731-5050.

Incentive Programs

Incentive programs should be considered to promote the use of community collection programs. Incentive programs that have been used for recycling include a voucher system whereby residents that drop off wastes to a community collection center receive a credit towards landfill disposals or their next utility bill.

DESIGNING THE PROGRAM

Choosing a Collection Method

1. Select one, or a combination of, the following approaches:

Collection Site Service - This involves setting up a collection area where the public can come and drop off their hazardous wastes.

Door-to-Door Pickup Service - Predesignated milk runs are developed whereby registered hazardous waste haulers and fire department/environmental health personnel 1) literally go door to door, or 2) stop at residents that have called in and scheduled a pickup.

Phone-in Service - This involves a telephone referral service where callers are informed on a case-by-case basis what to do with their waste (e.g. take wastes to recyclers, private transfer facilities, agricultural commissioners, or store properly until community collection days).

Combined Approach - Perhaps the best program design would involve a combination of the above methods. A well publicized and accessible collection site service can be augmented with a pickup service for individuals with transportation problems or for wastes requiring special handling. A phone-in service could also address special concerns about whether products are hazardous, safe use of products, and safer substitutes.

2. Decide whether the service would be provided year round or periodically.
3. If the service is provided periodically, provisions need to be made for handling inquiries and problems that arise when the collection service is not available.

Determining Service Area and Use of Service

1. Decide geographic area to be addressed.
2. Determine who will be eligible to participate (e.g. households, small businesses, government agencies, schools, farmers, etc.)
3. Establish fee structure, if any.

Waste Accepted

1. Determine what waste will be accepted by the collection program. The following products are commonly accepted: waste oil, paints, pesticides, cleaners, thinners/solvents, automotive products, hobby supplies, pool chemicals, acids, pharmaceuticals, and aerosols.
2. Educate the public on what waste will be accepted and what is considered "hazardous" for this program.
3. Check with hazardous waste contractors and facilities involved with the program to assure that your list of "wastes accepted" are within their handling, storage, transport, and disposal capabilities.
4. Any unidentified wastes brought and accepted should be identified by a chemist or trained individual knowledgeable in chemical

characteristics and incompatibilities before being packaged for transport. Wastes that cannot be identified by physical assessment or conversation with the owner may not be packaged until the substance/waste has been analyzed and the appropriate chemical class identified.

5. Emptied hazardous materials and pesticide containers from households, which do not drip when turned upside down, of one gallon or less in capacity, may be disposed of as non-hazardous waste.

Waste Excluded

1. Determine what waste will be excluded from the collection program based on the hazardous materials management expertise of those involved with the program. Some of the following types of wastes have been excluded from various programs: shock sensitive materials, radioactive materials, PCB wastes, pressurized gas cylinders, infectious waste, explosives (including ammunition), waste oil, and unidentified wastes.
2. Inform the public on the type of waste excluded.
3. Develop a contingency plan for handling the excluded waste if it turns up during the collection program. All wastes brought to a collection site should be accepted and appropriate authorities immediately notified (e.g. explosive experts) to properly dispose of the waste.
4. Extremely hazardous waste or waste banned from landfills must be so marked and separated from other household hazardous wastes collected. An agreement from the treatment, storage, transfer or disposal facility to handle these wastes must be obtained prior to collection. Notice of waste types and volumes must be submitted to the DHS prior to transport. If, however, the circumstances are such that the DHS cannot be notified until after transport to an approved TSD facility, DHS should be notified at the first available opportunity. An extremely hazardous waste permit must be obtained from DHS prior to disposal.

Quantities Accepted

1. Decide if any quantity limit will be placed on the waste accepted from each household/person using the program. In California, the maximum amount of hazardous waste transported by an unregistered hauler, at any one time, should not exceed 50 lbs or 5 gal, as long as single containers are less than 1 gal or 10 lbs., packed carefully, and wastes are not mixed. (There are no limits, however, on the number of trips that can be made.) This does not apply to extremely hazardous wastes as defined by Title 22 of the California Administrative Code, Section 66685.
2. Decide what the quantity limit will be, if any. Examples of limits enforced by a few communities are:

- three 55-gal drums per person (Alaska),
 - one 55-gal drum or 450 lbs (amounts in excess of the limit are charged a discounted fee for disposal - Florida), and
 - free disposal for first 5 lbs or 5 gal (beyond this there is a \$2.00 charge for each additional 5 lbs or 5 gal increments - Lexington, MA)
3. Decide what will be done for households possessing amounts in excess of the disposal cutoff limit (e.g. additional fee).

Site Location (for collection site method)

1. Target a specific geographic area for a collection site.
2. Look for appropriate locations in that area (e.g. industrial parking lots, fire departments, government owned parking lots, public works yards, and recycling centers).
3. Collection sites should be located based on the potential volume of waste generated by households in surrounding areas.
4. Collection sites should be located to minimize the potential threat of hazards to public health and the environment.
5. Regional sites (i.e., sites serving more than one community) should enlist the participation from all communities it serves before choosing a location(s).
6. Choose a location that is easily accessible from major transportation arteries, can accommodate flow of traffic into and out of the area, has ample parking space, and has name recognition. (One day programs should be prepared for a heavy flow of traffic.)
7. Preventing runoff from hazardous waste handling areas to other areas of the facility or environment should be considered when determining site location.
8. Seek approval for the location site by the government agency responsible for hazardous waste management in your state/community.
9. Site locations shall take into consideration the possibility of inclement weather. A contingency plan should be developed in the event of rain, sleet, hail, etc.
10. Whenever possible, collection sites should be structured in a way that allows incoming wastes to be presorted upon arrival and then placed in a controlled area for packaging.
11. Incompatible wastes should be kept separated, including unidentified wastes, while they are waiting to be packaged for transport.

12. The area for sorting, packaging, and storing the hazardous waste should not be accessible to the public (e.g. the area must be managed to prevent access).
13. Eating, drinking, and smoking should be prohibited at the collection site work area.

Site Layout (Collection site method)

Sites should generally have the following three working areas:

1. Receiving Area - This is where eligibility for the program is established (drivers license, zip code, etc.). Participants are greeted and may be asked to complete a form stating what was brought to the site. If applicable, fees are paid here. Participants may be asked to complete a short questionnaire evaluating the program. Check is made to assure that no unidentified or excluded wastes are collected. (Such incidents will be handled on a case-by-case basis by a predesignated onsite supervisor.)
2. Collection Area (Restricted to the Public) - Wastes are placed in this area immediately after receiving it from the public. Pre-sorting of the waste is conducted.
3. Packaging Area (Restricted to the Public) - Wastes are packaged with absorbent materials in drums and readied for transport to a TSD facility. Wastes are placed on the truck for transport. Wastes are manifested or shipping papers are completed.

Choosing the Best Time and Date

1. Consider the possibility of inclement weather.
2. Consider dovetailing the program with a compatible event (e.g. National Poison Prevention Week, National Fire Safety Week)
3. Weekday programs preclude participation by those who work 8:00 a.m. to 5:00 p.m. unless offered in a business area before and/or after normal working hours.
4. Operating hours should allow sufficient time for site personnel to set-up and clean-up the location.

Personnel

1. The numbers of persons needed at each site will vary depending on the level of participation expected from the community. The following staff will be needed: personnel who can accept the waste from persons bringing it to the site and assist those persons in completing any necessary paper work; personnel who can presort the waste into compatible categories (optional); personnel who can identify and

package compatible waste and complete a manifest document or shipping paper; and personnel who can transport the waste to an approved treatment, storage or disposal facility. Often, several staff persons are capable of performing several or all of the above mentioned activities. (As an example, the City of Palo Alto employed the services of six hazardous waste professionals from a hazardous waste management facility to identify, sort, and package the waste for disposal. The firm also transported and manifested the waste. Two additional city staff persons were on hand to greet people as they came to the collection site, offer any assistance that was needed, and answer questions that arose concerning the program.

2. Personnel who sort and package waste at the collection site for transport to a hazardous waste TSD facility must be trained and knowledgeable in the incompatibility of various classes of waste. Twenty semester units of chemistry and two years of on-the-job experience or the equivalent is a minimum requirement for personnel involved with packaging waste for transport. (Such personnel are available from hazardous waste management companies and private consulting firms.) Personnel with such experience may supervise other individuals with less experience/qualifications if such persons assist solely in presorting the hazardous waste. For example, firefighters may assist in presorting waste into DOT hazard classes but may not package the waste for shipment. This will allow the "packer" to double check the waste going into a container and will ensure that incompatible wastes will not be packaged together.
3. At least one hazardous waste professional should be trained to classify hazardous waste and be competent to perform tests to identify characteristics of hazardous waste (e.g. pH, flammability, etc.)
4. Personnel involved with packaging/transporting must be trained in: (a) proper response to fires or explosions, (b) proper response to incidents involving soil and groundwater contamination, and (c) accident prevention. All personnel must be instructed on the use of protective devices to minimize exposure to hazardous waste (e.g. use of respiratory gear, gloves, etc.). Personnel must also be instructed on the proper procedures for using such devices (e.g. beards, facial hair, and sideburns are prohibited when using a respirator).
5. All persons handling hazardous waste should have a medical clearance approved by the company managing the program and no person should be assigned a task that requires the use of respiratory protection until it is determined (by a physician) that he/she is physically capable of using such devices. Staff should be instructed not to wear contact lenses at the collection site to prevent eye damage.
6. Personnel who package the waste for transport to a hazardous waste TSD facility must be familiar with and comply with the DOT placard and labeling requirements and the hazardous waste manifest requirements.

7. Personnel who transport the waste to a hazardous waste TSD facility must be registered by the State as a hazardous waste hauler and must comply with the State's hazardous waste manifest requirements.
8. At least one staff person working during the collection program should be trained to perform general first aid and should be knowledgeable on safety measures to be taken in the event of an accidental contact with a hazardous waste.
9. An onsite supervisor should be available and responsible for initiating an emergency response plan that includes site evacuation procedures. The onsite supervisor also assumes responsibility for accepting all unidentified wastes and ensuring proper handling and disposal.
10. The onsite supervisor or project coordinator should ensure advance notification to local police, fire departments or emergency response units prior to beginning a waste collection program.
11. The onsite supervisor should have the authority to remove anyone from the site and prohibit re-entry if it is determined that the person threatens site security or personnel safety.
12. Collection site personnel should consist of a minimum of 6 persons who jointly should possess the necessary skills and expertise needed to accept, presort, package, transport, and manifest the waste and be responsible for onsite supervision and public relations.
13. All volunteers and paid workers should receive training session or briefing prior to or on the event date. This training should familiarize all personnel with the facility layout, operation plans and respective role of co-workers.

Equipment/Materials

1. The following materials should be available for community collection programs:
 - Containers must meet DOT requirements (Title 49 CFR, Parts 171-178). Most community programs have used 17H open head 55-gal steel drums. Reconditioned drums are cheaper. Drums may be donated by local industries. Extra drums and absorbants should be available.
 - DHS certified and CHP inspected vehicle
 - Ground and table covers (e.g. heavy plastic to protect against contamination from spills in area where wastes are accepted, sorted or packaged)
 - Absorbant materials for spills and lab packing (e.g. vermiculite, dry sawdust)
 - Tarps to shield collected wastes from exposure to wind and rain.
 - Simple (low cost) on-the-spot lab tests for analyzing pH, flammability and PCB concentration. A "HAZCAT" kit with trained personnel is recommended.

- Signs (used to offer directions to collection sites and to offer safety advice - e.g. "No Smoking", "Restricted Area-Keep Out").
 - Rope, tape and traffic cones (used to partition off restricted areas and to set-up a traffic pattern for drive-up delivery of waste)
 - Tables/chairs
 - First aid kit
 - Gloves, safety glasses, and lab jackets for employees
 - Emergency response equipment, including protective clothing for workers (arrange for local hazmat teams to be available on standby)
 - Communications systems (e.g. telephone, bullhorn, two-way radios)
 - Trash dumpsters for non-hazardous waste
 - For one day programs, balloons or flags to draw attention to the site
 - Carts for moving the wastes from vehicles to sorting areas
2. An eyewash, shower station or hosing device, and dry chemical extinguisher for Class A, B and C fires should be available near the collection area.
 3. Spill containment materials should be available for all programs and shall include enough absorbent materials to contain a spill of 10% of the anticipated volume.
 4. All disposable cleanup materials and protective clothing used during a spill cleanup shall be packaged, transported, and disposed of as hazardous wastes. Non-disposable equipment/materials used and contaminated should be decontaminated at the earliest possible moment.
 5. Labels and placards must be available to attach to all containers and vehicles in accordance with State regulations.

Permits/Variations

1. In order to collect, store, treat, or dispose of hazardous waste, a permit or permit variance must be received from the DHS. Since community collection programs receive hazardous waste from more than one producer, they are classified as offsite hazardous waste facilities (as defined in Section 66136, Title 22, California Administrative Code). California regulations require a permit or permit variance to be obtained from the State Department of Health Services to operate an offsite hazardous waste facility. To date, household hazardous waste collection programs have received permit variances from the DHS. The Department is considering the adoption of guidelines for establishing household collection programs. Proposed guidelines call for submittal of a permit variance application and operation plan. Draft forms are presented in Appendices A and B, respectively.

Generator Identification Number

1. Generators of hazardous waste are ultimately responsible for the proper handling, storage, transport and disposal of their waste, as defined in Title 22 of the California Administrative Code. It is the generator's responsibility to determine if wastes are regulated. In household collection programs, the entity obtaining the generator ID number assumes these generator liabilities.
2. Generators must not treat, store, dispose of, transport, or offer for transportation hazardous waste without having received a generator ID number. A generator ID number must be obtained for community collection programs. An application for a generator ID number is made by calling EPA's RCRA Industry Assistance at (415) 974-7472 from 9 a.m. - 2 p.m. weekdays. The application form for obtaining an ID number is presented in Appendix C.

A provisional generator ID number can be obtained over the telephone free of charge. This is usually given for one-time disposal programs and is good for up to 90 days. A permanent generator ID number will be required for ongoing programs. To obtain an ID number, the following information must be provided:

- Name and mailing address of the generator
 - Telephone number and contact person
 - Site of collection program
 - Day(s) program will be offered
 - Types and amount of waste expected to be collected
 - Name and address and ID number of registered transporter of the waste and permitted TSD facility
3. The ID number may be obtained by the local entity or special interest group sponsoring the collection program (e.g. County Department of Environmental Health) or by the contracted hazardous waste hauler.
 4. A different generator ID number is needed for each collection site location.

Transporting the Waste

1. Community programs must ensure that all hazardous waste collected is transported by registered haulers. Communities are encouraged to rely on the expertise of private registered hazardous waste haulers.
2. Call the DHS Regional Offices or the Hauler Unit at (916) 324-2430 for current listing of registered hazardous waste haulers.
3. Communities that hire registered haulers or are considering hauling their own wastes (e.g. for door to door pickups or transporting waste

from collection sites to TSD facilities) should know the following responsibilities of transporters:

- Vehicles must be registered by DHS and pass a CHP vehicle/container inspection (see Appendices D, E, and F for appropriate application forms)
 - Use DOT specified containers and placards. Each container of waste must be labeled in accordance with CFR 40 and 49 regulations (i.e., poison flammable, corrosive, irritant, oxidizer).
 - Get a generator ID number from the DHS if the transporter mixes waste
 - Wastes cannot be stored longer than 96 hours at an offsite facility without a storage permit or variance from the DHS
 - Carry information on first-aid or safety measures to be taken in case of accidental contact with the particular hazardous waste being transported
 - Notify appropriate officials and provide for cleanup operation in the event of a spill
 - Assure that waste is accompanied by a manifest completed according to DOT (49 CFR 172) and EPA (40 CFR 262) regulations
 - Sign the manifest after receiving the waste from the generator and leave the generator a copy
 - Ensure delivery of waste to an approved treatment, storage, or disposal facility designated on the manifest
 - Obtain signatures and write delivery date on the manifest when arriving at the destination for treatment, storage, or disposal of the waste
 - Keep a copy of the manifest and give remaining copies to the TSD facility
 - Retain the manifest copy for three years
4. Containers leaving the collection site in lab packs or other drums must be tightly sealed and suitable for storage and transport. All lab-packed waste must be compatible.
5. All lab-packed waste must contain enough absorbent material, per drum, to contain any liquids in the event of a spill and to fill the drum to prevent breakage of containers. Absorbent material must not be capable of reacting with or being decomposed or ignited by the liquid waste in the containers placed within the drums (lab-packs).

6. No reactive wastes may be lab-packed without prior treatment to render them non-reactive. Wastes which are classified as reactive solely because they contain cyanide or sulfide may be lab-packed without prior treatment.

Hazardous Waste Manifest

1. Six copies of the uniform Hazardous Waste Manifest (Appendix G) must be completed by the generator (as specified by the generator ID number). The generator retains one copy and sends one copy to DHS. The remaining four copies accompany the hazardous waste transported.
2. The generator is also responsible for certifying that the wastes are properly classified and packaged before shipping to a TSD facility. Each waste must be identified by the proper shipping name, hazard class and ID number (as specified in 49 CFR 171-177). Manifesting the waste is generally done by a contracted hazardous waste management firm or hauler that is thoroughly familiar with the US DOT and EPA regulations.
3. Each waste should be carefully inventoried and categorized as it is received; listing chemical name, container size, and estimated amount of material remaining in each container. As each waste is packed, the appropriate drum number is listed on the inventory. A complete inventory of waste received can be attached to the Uniform Manifest to satisfy item 11. Check with receiving TSD facilities for any special requirements they may have for listing the contents of lab packs.
4. A generator must designate on the manifest one facility which is permitted to handle the waste described on the manifest.
5. A generator may also designate on the manifest one alternate facility which is permitted to handle the waste in the event an emergency prevents delivery of the waste to the primary designated facility.
6. If the transporter is unable to deliver the hazardous waste to the primary designated facility or the alternate facility, the transporter must notify the generator and the generator must either designate another facility or instruct the transporter to return the waste.
7. The generator must sign the manifest, retain one copy, and give the transporter the remaining copies of the manifest.
8. Manifests must be signed and dated by the TSD facility to certify that the waste was received.
9. Within 30 days, the owner or operator of the TSD facility will retain one copy of the manifest, return one copy to the generator, and send one copy to DHS.

10. Copies of the manifest must be sent to, and retained for three years by the generator and DHS. A schematic of the manifest system is presented in Appendix H.
11. If the generator does not receive a copy of the signed manifest from the TSD facility, the generator must contact the appropriate DHS regional office within 45 days from the date that the waste was accepted by the registered hauler.

Storing the Waste

1. Hazardous waste received by community programs cannot be stored longer than 96 hours without a storage permit or variance from DHS.
2. Programs wishing to store waste longer must apply for a storage permit or variance.
3. Alternatively, collected wastes can be transported to a local hazardous waste transfer station. This allows the waste to be accumulated until a full load (about 80 drums) can be taken to a treatment, recycling or disposal facility.
4. Hazardous waste haulers may temporarily store household hazardous wastes on their trucks for a period not to exceed 96 hours.
5. A label shall be maintained on all non-stationary containers in which hazardous wastes are stored and shall include:
 - Composition and physical state of the waste.
 - Special safety recommendations and precautions for handling the waste.
 - Statement(s) which call attention to the particular hazardous properties of the waste.
 - Date of acceptance at the storage facility.
6. Records for storage of all hazardous wastes shall be maintained pursuant to Section 66545 of Title 22, California Administrative Code (CAC) which states that:
 - Hazardous waste haulers and hazardous waste facility operators shall maintain at their business address for a period of not less than one year the following information:
 - a. The names, addresses and telephone numbers of the waste producer, hauler, processor and disposal site operator of each load of waste hauled, received or stored.
 - b. The source, identity, chemical composition, volume, physical state, container type and hazardous properties of each load of waste received, hauled or stored at the site.

- c. The method used to process or dispose of each waste.
 - d. The date that each hazardous waste was received for storage.
- Copies of completed manifests may serve the purposes in items (a) through (d).
 - The operator of a hazardous waste disposal site where solid and hazardous wastes are not commingled shall record on a grid or other suitable map the general locations where hazardous wastes have been disposed of. The hazardous waste types shall be identified on the grid or map by the types of waste, including but not limited to the following where applicable: acid solution, alkaline solution, pesticides, paint sludge, solvent, tetraethyl lead sludge, chemical toilet waste, tank bottom sediment, oil drilling mud, contaminated oil and sand and latex waste.
7. A convenient guide to storage and transport compatibility, "Hazardous Materials Loading and Storage Guide," is available from the American Trucking Association, 2200 Mill Road, Alexandria, Virginia 22314, (203) 838-1847.

Insurance

1. Generators (collection site operators) must have adequate personal and liability insurance in the event of an accident/injury.
2. Since generators are strictly liable for the handling, storage, treatment, and disposal of their hazardous waste, discuss possibility of having a hazardous waste management firm assume generator responsibilities. Consider requiring evidence of financial responsibility from hazardous waste management firms.
3. Investigate possibilities of insurance riders that would include Environmental Impairment Liability (gradual pollution coverage) and volunteers.
4. Hazardous waste TSD facilities must have personal and liability insurance for post-closure cleanup should it become necessary. Treatment, storage and disposal facilities should contact an attorney and insurance company for liability requirements particular to their facility.
5. Volunteers at a collection program may be required to sign a liability waiver.

Waste Disposal

1. Investigate any restrictions applicable to the hazardous waste treatment/disposal facility you intend to use (see Appendix I) for landfill restrictions on certain hazardous wastes) or which are used by transfer facility.

2. Consider appropriate methods for disposing of the waste such as:
 - waste exchange/solvent recycling (The DHS California Waste Exchange at [916] 342-6565 will furnish a list of companies with the types of waste they will receive and minimum amount accepted.)
 - waste oil recycling (arrange with local gasoline service stations, auto service centers, oil recyclers or waste oil haulers). Call (800) 952-5545 for name of nearest service station that will accept waste oil for recycling. An abbreviated manifest procedure has been developed by the DHS for transporting drain oil. For information, call (916) 324-2428. See Appendix J.
 - product reuse (except for paints, the reuse of products is not permitted unless specific approval is requested and granted by the DHS. Near full cans of paint can be passed on to possible local users, such as artists, schools and recreation departments. If this option is used, consider having recipients sign a liability waiver to "hold harmless" anyone associated with the collection program. See Appendix K. Cans with residual unleaded paint can be air dried and sent to a solid waste landfill. Similarly, collection programs can apply for permit variances to treat their wastes by solidifying non-lead based paints with special absorbents. A cooperative effort should be established with county agricultural commissions that may be able to find users of non-restricted pesticides.)
 - Class I hazardous waste treatment and disposal facilities.
3. Consider how the disposal charges are calculated by the facility that is taking the waste (e.g. by the drum, cubic yard or ton).

Fees/Taxes

1. On or before March 1, generators of over 500 lbs per year of hazardous waste must report to the State Board of Equalization the total tons per month of hazardous waste disposed of in the previous year. The Board will assess a tax and notify the generator of the amount by May 1. Generators are required to pay on or before July 1. Local vector control agencies or county agricultural commissioners are exempt from taxation on voluntary wastes collected up to 1,000 kilograms per month (as specified in Section 25345.5 of the California Health and Safety Code). State Board of Equalization, P.O. Box 647, Sacramento, CA 95803, (916) 445-2579.

Program Evaluation

1. In addition to data collected on the manifest, assess total wastes collected (by DOT hazard class or type of wastes such as pesticides, cleaners; amount of wastes, total drums and individual containers dropped off; oil recycled; and paints donated to community group).

2. Design a participants questionnaire that will provide feedback for improving program.

- zip code (full address optional)
- number of households represented by delivery
- how heard about service
- how long products had been stored
- attitude on fee for services
- general comments/suggestions

PUBLICITY AND EDUCATION

The key to a successful community hazardous waste disposal program is publicity and education. People need to be aware that the service is available and they need to know the potential dangers from the unsafe use and disposal of hazardous materials/wastes. While hazardous materials are common in households and businesses, people seldom consider them "hazardous wastes" when discarding them down the drain or in the garbage.

Methods of Publicity

While numerous methods are available to publicize a collection program, the following approaches have been the most effective to ensure good participation.

1. Press packets distributed to local radio stations, newspapers, television stations and special interest organizations can provide the best "free" coverage. Be sure to do follow-up telephone calls to make sure the packets were received.
2. Newspaper advertising is perhaps the best way to reach a wide audience. Most participants in household collection programs have learned of the program through the newspaper.
3. Utility bill inserts.
4. Fliers distributed by schools, grocery stores, community service organizations, refuse collectors, business associations, volunteers, etc.
5. Trash can decals left by refuse collectors.
6. Public service announcements.
7. Workshops (for small businesses).
8. Educational curriculum for schools (curricula are available from Golden Empire Health Planning Center).

Contents of Publicity and Educational Programs

1. Logistics of collection program (schedule, location, wastes accepted/excluded, fees, telephone number for questions, etc.)
2. Explanation of what is hazardous and problems resulting from improper disposal.
3. Alternatives to hazardous products.
4. Proper use of hazardous products.
5. Proper disposal of hazardous products/waste.
6. Safe transport of wastes to collection program:
 - Package the material in containers that do not leak to avoid negative reactions from incompatible chemicals;
 - Package materials to ensure that any movement during transport will be minimized;
 - Keep products away from passengers;
 - Have products labeled and in their original containers whenever possible;
 - Keep combustibles (e.g. aerosols) out of direct sunlight and away from heat sources; and
 - If you have a product and are not sure what it is or how to handle it, call for assistance/information.

CHAPTER IV

GUIDELINES FOR HAZARDOUS WASTE CONTROL PROGRAMS AT MUNICIPAL LANDFILLS based on Los Angeles County Sanitation Districts

The objective of the following guidelines is to prevent the illegal disposal of small amounts of hazardous wastes into municipal solid waste landfills. These guidelines are based on the operating control program of the Los Angeles County Sanitation Districts. It is recognized that each landfill should scale these management practices to their own capabilities.

1. Post signs at landfills warning haulers that concealed hazardous waste in mixed loads of refuse is illegal. Signs should also warn that it is illegal to dispose of liquid and semi-solid wastes at landfills (pursuant to Title 23, Chapter 3, Subchapter 15).
2. An ongoing inspection program should be established at each landfill. While the number of inspectors assigned to a landfill will vary with the amount of wastes received, it is recommended that a full time inspector be assigned to each landfill to spot-check loads and the working face. (In Los Angeles County, two inspectors from the county health department are assigned this task on a full-time basis.) The inspector should randomly select and inspect five truckloads each day. Bulldozer operators should be trained to keep an eye out for unauthorized discards while moving refuse and cover material at the working face. Inspectors can be specially trained Local Enforcement Agency inspectors with some simple onsite analytical capabilities. (If inspection programs are conducted at transfer stations, the need for reinspection at the landfill would be minimal.)
3. A series of six, intensive, unannounced manual inspections of refuse loads should be conducted throughout the year.
4. When suspicious containers are located, attempts should be made to identify the substances and determine the producer and hauler of the material. All suspected wastes should be considered hazardous unless proven otherwise. If the waste is potentially hazardous, the waste should be manifested and removed by a State registered hazardous waste hauler to a licensed disposal facility. For manifest purposes, the landfill would be considered the producer.
5. If the waste cannot be removed without significant danger to employees (e.g. damaged container) and can be safely contained in the landfill, the waste should be carefully buried.
6. After a hazardous waste is discovered, a letter should be sent to the generator of the hazardous waste, if known, stating why the waste cannot be sent to a municipal landfill. Copies of the letter should be sent to the Local Enforcement Agency and the state agencies responsible for enforcing hazardous waste disposal regulations. (This

is presently the State Department of Health Services and Water Quality Control Board.) Landfill owners/operators can ban delinquent haulers from disposal privileges. Refuse collectors can also refuse pickup services for generators illegally disposing of hazardous wastes.

7. An aggressive inspection program should be initiated to prevent the disposal of infectious wastes in landfills. All infectious wastes must be disinfected and placed in red plastic bags. Trained inspectors can determine from the appearance of the special red plastic bags whether or not they have been autoclaved.

When unautoclaved bags are detected, the originating health facility should be identified and the bags should be carefully buried at the direction of the county health department. The county health department should notify the negligent health facility and the landfill owner/operator should also notify the health facility and waste hauler, warning that continued illegal disposals will result in the suspension of landfill disposal privileges.

8. Records should be maintained on all medical facilities improperly disposing of infectious wastes. Repeated offenders should be placed on a two month probation. During the first month every refuse vehicle containing waste from the medical facility must be accompanied by a letter signed by the chief responsible officer of that facility certifying that the load does not contain any type of infectious waste. The contents of each such vehicle should be inspected at the landfill. Any violation during a probationary period should result in a six month suspension of disposal privileges.
9. A continuous monitoring program should be implemented to prevent illegal disposal of radioactive wastes. (Such a program is appropriate only for landfills serving major metropolitan areas or potentially significant sources of radioactive wastes, such as medical centers or research facilities.) Highly sensitive radiation meters of the type used by the California Highway Patrol for truck inspections (Gamma Scintillometers) should be installed at weigh scales at landfill entrances. A Gamma Scintillometer is sensitive both to the high energy radiation detectable with geiger counters and the low energy radiation typically emitted by radiological substances used for medical purposes. Meter alarms should be set at 20 kc/min which is the lowest level that can be reliably monitored without exceedances caused by random background fluctuations (the California Highway Patrol uses a higher, less conservative 100 kc/min alarm level). False alarms will occur periodically. For example, refuse vehicle drivers who have, under medical supervision, received radioactive substances may trigger the alarm. Employees wearing a watch with a luminescent dial containing radium may also trigger the alarm. If too many false alarms occur, consideration may be given to raising the detection level of the radiation meter.
10. Monitoring programs should be closely coordinated with the county health department radioactive waste monitoring program. Whenever a

refuse vehicle triggers the radiation meter alarm, the waste load should be taken to an isolated portion of the site. The driver should be checked for contamination and isolated if necessary. An area should then be staked out around the truck at a radius having only background radiation levels. The county personnel should be summoned, and, upon their arrival, the load spread to facilitate inspection. The radioactive material should then be recoverable and either returned to the producer or retained for safe storage by the county representative.

11. The radioactive waste producer can normally be readily determined and the hauler identified. Negligent parties should be notified, issued citations, and warned that repeated violations will result in a suspension of landfill disposal privileges. A probationary program should be established similar to that for illegal disposal of infectious wastes.

Most radioactive wastes will consist of entirely low level activity materials. Most substances will be short-lived isotopes with no long term radioactivity. The radioactive materials are typically hospital wastes (e.g. bandages, needles) contaminated during radiological testing. Such substances need only to be held in a "safe" room by the producer for a few weeks until radiation declines to background levels. The improper disposal of such materials with ordinary trash is usually due to a minor breakdown in control of the wastes. For example, a patient discarding a bandaid that covered the injection point of a radioactive material. Landfill operators can work with hospitals to improve their management of these wastes. Hospitals can require that all hospital wastes be conveyed past a single point for scanning with radiation meters. This will ensure that any improperly disposed of materials are detected prior to leaving the hospital.

REFERENCES

Anon. "How Hazardous are Municipal Wastes?" American City and County, p. 41-42, March 1981.

Los Angeles County Sanitation Districts. "Control of Infectious, Hazardous and Radioactive Waste Disposal at the Puente Hills Landfill." Memorandum from Walter E. Garrison, December 2, 1983.

APPENDICES

APPENDIX A

REQUEST FOR A HOUSEHOLD HAZARDOUS WASTE FACILITY PERMIT VARIANCE

California State Department of Health Services

Toxic Substances Control Division

I hereby request a variance from the Hazardous Waste Facility Permit requirements of the California Department of Health Services (DHS).

I currently have the following hazardous waste management operation(s) at my facility: (check all that apply)

_____ Hazardous waste collection program (household waste)

_____ Hazardous waste storage less than 90 days but over 96 hours

_____ Hazardous waste storage over 90 days (maximum of one year)

This facility is owned/operated by _____

and the facility is located at _____

I am requesting a variance for my facility based on Section 66310 (a) (1) and/or Section 66310 (a) (2) of the California Administrative Code.

I am attaching all applicable information and drawings as required in support of this variance request. For any facilities involving underground tanks, I have attached information describing the leak detection program.

I understand that any variance from the Hazardous Waste Facility Permit requirements of DHS, if granted, does not exempt my firm/organization from any other applicable laws and regulations governing the management of hazardous wastes.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, of those persons directly responsible for gathering the information, the information submitted is to be, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

(Certification Signature)

(Company or Applicant)

(Title)

(Mailing Address)

(Telephone)

(City, State, Zip)

(Date)

(ID Number if Applicable)

OPERATION PLAN FOR A
HOUSEHOLD HAZARDOUS WASTE COLLECTION PROGRAM

The following information should be included with a permit/
variance application for a household hazardous waste collection
program.

1. Respond to the following information:

- a. Identify the hazardous waste management firm involved with collecting,
sorting, and packaging the waste.

Name _____ EPA # _____

Address _____

Contact Person/Telephone Number _____

- b. Identify the hazardous waste management firm transporting the waste
to a treatment, storage, or disposal facility.

Name _____ EPA # _____

Address _____

Contact Person/Telephone Number _____

- c. Identify the hazardous waste treatment, storage, and/or disposal
facility(ies) to which the waste will be taken:

Name _____ EPA # _____

Address _____

Contact Person/Telephone Number _____

If additional facilities are involved, include the name, address, and
telephone numbers of those facilities as well.

2. a. Identify the generator of the hazardous waste:

Name _____ EPA# _____

Address _____

Telephone Number/Contact Person _____

- b. Identify at least one person who is familiar with all aspects of the
collection/disposal program.

Name _____ Title _____

Work Telephone Number () _____

Emergency Telephone Number () _____

3. Identify the type of (or combination of) collection system you are about to implement:

_____ Collection site

_____ Door-to-door pickup

_____ Other (please specify) _____

4. If collection sites are being used, please give the location of the site(s) and the dates and times on which each site will occur.

5. Indicate the amount of time the waste will be stored at a household hazardous waste collection facility.

_____ Up to 96 hours

_____ Less than 90 days and over 96 hours

_____ Over 90 days (maximum of one year)

_____ The hazardous waste collected will be stored at a DHS authorized/permitted transfer station or storage facility immediately following the collection program. The name, address, and telephone number of where the waste will be stored is provided below:

NAME: _____

ADDRESS _____

TELEPHONE NUMBER: _____ () - _____

6. If wastes are to be stored at a location (longer than 96 hours) before being transported to a permitted/authorized treatment, storage, or disposal facility, (a) identify that location; (b) specify the length of storage; (c) state the manner in which the containers are stored; and (d) identify security measures taken to prevent release of the waste or vandalism.

7. Include with this permit application a map layout showing the general collection site parameters. Indicate the following:
 - a. North arrow
 - b. Date map is completed
 - c. Cross streets
 - d. Access road and traffic patterns
 - e. Parking facilities (indicate amount of parking spaces)
 - f. Areas accessible/not accessible to public
 - g. Security fencing
 - h. Collection areas
 - i. Location of emergency response equipment
8. Provide the following information associated with the maps:
 - a. A written description of the property and surroundings
 - b. Characteristics of access roads (e.g., type of surface)
 - c. Characteristics of parking facilities
9. Describe the program operations:
 - a. Who will accept waste from the public
 - b. Who will sort the waste
 - c. Who will package the waste for transport to a TSD
 - d. Give the qualification for each of the above (or attach resumes to this application)
 - e. Give a brief narrative of your site operations (i.e., explain what will happen from the point the hazardous waste is accepted at the collection site until the time it is transported offsite; or explain the methods used for a door-to-door pickup service)
10. With respect to equipment/materials
 - a. Identify the containment drums and packaging material used
 - b. Identify the safety equipment used by personnel
 - c. Describe any floor covering used and where it is placed
 - d. Describe precautions taken to effectively respond to an emergency injury/chemical exposure
11. Specify the types of materials accepted
12. If accepting unidentified waste, describe procedures for analyzing the waste. If unidentified materials are brought to a site, describe what will be done.

13. What wastes (if any) do you intend to recycle or be reused (e.g. giving latex paint to community groups for reuse). State how this will be accomplished.
14. State procedures used in the event of inclement weather.
15. Describe or enclose a copy of the emergency procedures or contingency plan used in the event of an accidental release of a hazardous chemical. At a minimum, the plan should include:
 - a. Description of actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of waste or their constituents into the air, soil, or surface water.
 - b. The name, address, and telephone number (home and work) of the person serving as emergency coordinator as well as a name and telephone number of the program supervisor/manager.
 - c. List of equipment available during the program that is used for emergency response operations. Include where the equipment can be found. Equipment refers to such items as fire extinguishing systems, spill control equipment, communications equipment, and decontamination equipment.
 - d. Procedures used to notify DHS and other appropriate agencies regarding the accidental release of materials and the cleanup procedures.
16. Identify party(ies) responsible for insurance/liability resulting from accidental release/exposure to hazardous materials and include a copy of the financial coverage.

| U.S. ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY | | INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act). |
|---|--|---|
| I. NAME OF INSTALLATION INSTALLATION'S EPA I.D. NO. | PLEASE PLACE LABEL IN THIS SPACE | |
| II. INSTALLATION MAILING ADDRESS | | |
| III. LOCATION OF INSTALLATION | | |
| FOR OFFICIAL USE ONLY | | |
| COMMENTS | | |
| | | |
| INSTALLATION'S EPA I.D. NUMBER APPROVED DATE RECEIVED (yr., mo., & day) | | |
| | | |
| I. NAME OF INSTALLATION | | |
| | | |
| II. INSTALLATION MAILING ADDRESS | | |
| STREET OR P.O. BOX | | |
| | | |
| CITY OR TOWN ST. ZIP CODE | | |
| | | |
| III. LOCATION OF INSTALLATION | | |
| STREET OR ROUTE NUMBER | | |
| | | |
| CITY OR TOWN ST. ZIP CODE | | |
| | | |
| IV. INSTALLATION CONTACT | | |
| NAME AND TITLE (last, first, & job title) PHONE NO. (area code & no.) | | |
| | | |
| V. OWNERSHIP | | |
| A. NAME OF INSTALLATION'S LEGAL OWNER | | |
| | | |
| B. TYPE OF OWNERSHIP (enter the appropriate letter into box) VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es)) | | |
| F - FEDERAL M - NON-FEDERAL | <input type="checkbox"/> A. GENERATION <input type="checkbox"/> B. TRANSPORTATION (complete Item VII) <input type="checkbox"/> C. TREAT/STORE/DISPOSE <input type="checkbox"/> D. UNDERGROUND INJECTION | |
| VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es)) | | |
| <input type="checkbox"/> A. AIR <input type="checkbox"/> B. RAIL <input type="checkbox"/> C. HIGHWAY <input type="checkbox"/> D. WATER <input type="checkbox"/> E. OTHER (specify): | | |
| VIII. FIRST OR SUBSEQUENT NOTIFICATION | | |
| Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below. | | |
| <input type="checkbox"/> A. FIRST NOTIFICATION <input type="checkbox"/> B. SUBSEQUENT NOTIFICATION (complete Item C) | | C. INSTALLATION'S EPA I.D. NO. |
| | | |
| IX. DESCRIPTION OF HAZARDOUS WASTES | | |
| Please go to the reverse of this form and provide the requested information. | | |

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

| 1 | 2 | 3 | 4 | 5 | 6 |
|---------|---------|---------|---------|---------|---------|
| 23 ~ 24 | 23 ~ 24 | 23 ~ 24 | 23 ~ 24 | 23 ~ 24 | 23 ~ 24 |
| 25 ~ 26 | 25 ~ 26 | 25 ~ 26 | 25 ~ 26 | 25 ~ 26 | 25 ~ 26 |

| | | | | | |
|----|----|----|----|----|----|
| 12 | 14 | 15 | 16 | 17 | 18 |
| 13 | 15 | 16 | 17 | 18 | 19 |
| 14 | 16 | 17 | 18 | 19 | 20 |
| 15 | 17 | 18 | 19 | 20 | 21 |
| 16 | 18 | 19 | 20 | 21 | 22 |
| 17 | 19 | 20 | 21 | 22 | 23 |
| 18 | 20 | 21 | 22 | 23 | 24 |
| 19 | 21 | 22 | 23 | 24 | 25 |
| 20 | 22 | 23 | 24 | 25 | 26 |
| 21 | 23 | 24 | 25 | 26 | 27 |
| 22 | 24 | 25 | 26 | 27 | 28 |
| 23 | 25 | 26 | 27 | 28 | 29 |
| 24 | 26 | 27 | 28 | 29 | 30 |
| 25 | 27 | 28 | 29 | 30 | 31 |

| | | | | | |
|-----|-----|-----|-----|-----|-----|
| 21 | 32 | 33 | 34 | 35 | 36 |
| 22 | 23 | 24 | 25 | 26 | 27 |
| 28 | 29 | 30 | 31 | 32 | 33 |
| 34 | 35 | 36 | 37 | 38 | 39 |
| 40 | 41 | 42 | 43 | 44 | 45 |
| 46 | 47 | 48 | 49 | 50 | 51 |
| 52 | 53 | 54 | 55 | 56 | 57 |
| 58 | 59 | 60 | 61 | 62 | 63 |
| 64 | 65 | 66 | 67 | 68 | 69 |
| 70 | 71 | 72 | 73 | 74 | 75 |
| 76 | 77 | 78 | 79 | 80 | 81 |
| 82 | 83 | 84 | 85 | 86 | 87 |
| 88 | 89 | 90 | 91 | 92 | 93 |
| 94 | 95 | 96 | 97 | 98 | 99 |
| 100 | 101 | 102 | 103 | 104 | 105 |
| 106 | 107 | 108 | 109 | 110 | 111 |
| 112 | 113 | 114 | 115 | 116 | 117 |
| 118 | 119 | 120 | 121 | 122 | 123 |
| 124 | 125 | 126 | 127 | 128 | 129 |
| 130 | 131 | 132 | 133 | 134 | 135 |
| 136 | 137 | 138 | 139 | 140 | 141 |
| 142 | 143 | 144 | 145 | 146 | 147 |
| 148 | 149 | 150 | 151 | 152 | 153 |
| 154 | 155 | 156 | 157 | 158 | 159 |
| 160 | 161 | 162 | 163 | 164 | 165 |
| 166 | 167 | 168 | 169 | 170 | 171 |
| 172 | 173 | 174 | 175 | 176 | 177 |
| 178 | 179 | 180 | 181 | 182 | 183 |
| 184 | 185 | 186 | 187 | 188 | 189 |
| 190 | 191 | 192 | 193 | 194 | 195 |
| 196 | 197 | 198 | 199 | 200 | 201 |
| 202 | 203 | 204 | 205 | 206 | 207 |
| 208 | 209 | 210 | 211 | 212 | 213 |
| 214 | 215 | 216 | 217 | 218 | 219 |
| 220 | 221 | 222 | 223 | 224 | 225 |
| 226 | 227 | 228 | 229 | 230 | 231 |
| 232 | 233 | 234 | 235 | 236 | 237 |
| 238 | 239 | 240 | 241 | 242 | 243 |
| 244 | 245 | 246 | 247 | 248 | 249 |
| 250 | 251 | 252 | 253 | 254 | 255 |
| 256 | 257 | 258 | 259 | 260 | 261 |
| 262 | 263 | 264 | 265 | 266 | 267 |
| 268 | 269 | 270 | 271 | 272 | 273 |
| 274 | 275 | 276 | 277 | 278 | 279 |
| 280 | 281 | 282 | 283 | 284 | 285 |
| 286 | 287 | 288 | 289 | 290 | 291 |
| 292 | 293 | 294 | 295 | 296 | 297 |
| 298 | 299 | 300 | 301 | 302 | 303 |
| 304 | 305 | 306 | 307 | 308 | 309 |
| 310 | 311 | 312 | 313 | 314 | 315 |
| 316 | 317 | 318 | 319 | 320 | 321 |
| 322 | 323 | 324 | 325 | 326 | 327 |
| 328 | 329 | 330 | 331 | 332 | 333 |
| 334 | 335 | 336 | 337 | 338 | 339 |
| 340 | 341 | 342 | 343 | 344 | 345 |
| 346 | 347 | 348 | 349 | 350 | 351 |
| 352 | 353 | 354 | 355 | 356 | 357 |
| 358 | 359 | 360 | 361 | 362 | 363 |
| 364 | 365 | 366 | 367 | 368 | 369 |
| 370 | 371 | 372 | 373 | 374 | 375 |
| 376 | 377 | 378 | 379 | 380 | 381 |
| 382 | 383 | 384 | 385 | 386 | 387 |
| 388 | 389 | 390 | 391 | 392 | 393 |
| 394 | 395 | 396 | 397 | 398 | 399 |
| 400 | 401 | 402 | 403 | 404 | 405 |
| 406 | 407 | 408 | 409 | 410 | 411 |
| 412 | 413 | 414 | 415 | 416 | 417 |
| 418 | 419 | 420 | 421 | 422 | 423 |
| 424 | 425 | 426 | | | |

[illegible]

☐ * TOXIC
(D000)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

DATE SIGNED _____

APPENDIX D
INSTRUCTIONS FOR COMPLETING THE HAZARDOUS WASTE HAULER APPLICATION

If you intend to transport a hazardous waste (as defined by the California Health and Safety Code), you are required to register with the California Department of Health Services (Department) as a hazardous waste transporter.

In order to register, complete and forward ALL copies of the following forms to the Department. Be sure forms are completed in ink or typed and signed.

1. A "Hazardous Waste Hauler Application", Form EH 187. Instructions are enclosed for completing all forms.
2. An "Application for Vehicle/Container Inspection", Form DHS 8025. If you have more than 13 vehicles, you may make copies of the application for your use.
3. For each vehicle listed on Form DHS 8025 submit a copy of the vehicle registration, proof that the vehicle is registered to the applicant, or a lease agreement if the vehicle is leased. If the vehicles are registered to a DBA please identify the relationship of that DBA to the firm on your application.
NO VEHICLE INSPECTIONS WILL OCCUR UNTIL THE ABOVE IS RECEIVED. NO SUBSTITUTIONS WILL BE ALLOWED AT THE TIME OF THE INSPECTION.
4. A "Certificate of Insurance", Form DHS 8038. The insurance company is required to complete Form DHS 8038. Do not send this form under separate cover.
5. To obtain an Environmental Protection Agency Identification Number (EPA ID) please call (916) 324-1781 and an EPA ID number will be issued to you. This is necessary only if you do not have an EPA ID number presently.
6. Total fees. The fees include a Registration Fee, a Vehicle Fee and an Inspection Fee. Make checks payable to DEPARTMENT OF HEALTH SERVICES.

Any firm operating under more than one name must register each firm separately. The parent firm name should be placed on each application form. If all the firms wish to register under a single registration number, contact the Department for guidance. The firm name shown on all applications must be identical to the name displayed on the vehicle, pursuant to Section 66545(e), Title 22.

The Department will review the applications for completeness and forward the "Application for Vehicle/Container Inspection" to the California Highway Patrol. Upon passing the inspection, the applicant will be registered by the Department and issued a registration number and an EPA ID number if needed.

All communications with the Department concerning your application should be directed to the attention of the Surveillance and Transportation Unit at the following address:

Program Management Section
Toxic Substances Control Division
Department of Health Services
714/744 P Street
Sacramento, CA 95814
Phone: (916) 324-2430

For other information please call the Regional Offices at the following telephone numbers: Northern California Section (916) 739-3145, Berkeley (415) 540-2043, Los Angeles (213) 620-2380.

HAZARDOUS WASTE HAULER APPLICATION

| | | | |
|--------------------------------------|--|--------------|--|
| Firm Name | | | |
| Address (P. O. Box, City) | | DBA (If Any) | Telephone No. () |
| Previous Registration No. If Renewal | U. S. Environmental Protection Agency (EPA) Identification No. | | NOTE: List additional EPA ID Nos. with their addresses (street and ZIP code) on a separate sheet of paper. |

OWNERSHIP OF FIRM (List all partners if a partnership; list corporate officers if a corporation.)

| Name | Position |
|------|----------|
| | |
| | |
| | |
| | |
| | |
| | |
| | |

FEES

VEHICLE AND CONTAINER INSPECTION FEES
(Total from Application for Vehicle/Container Inspection)

VEHICLE FEES
(If none, please initial statement below.)

FIRM REQUESTS VEHICLE FEE WAIVER BECAUSE THE GROSS ANNUAL REVENUE FROM THE HAULING OF HAZARDOUS WASTES DOES NOT EXCEED \$35,000.

Written
Initials

REGISTRATION FEE

\$ 50.00

TOTAL FEES

(Make check payable to DEPARTMENT OF HEALTH SERVICES)

I understand and will comply with the applicable requirements of Chapter 6.5, Division 20, of the California Health and Safety Code and Chapter 30, Division 4, Title 22, of the California Administrative Code.

I certify under penalty of perjury to the accuracy of all statements made herein.

| | |
|--|-------|
| Name of Authorized Agent (Print or Type) | Title |
| Signature of Authorized Agent | Date |

APPENDIX E
VEHICLE/CONTAINER INSPECTION PROCEDURES

On the date of inspection by the California Highway Patrol, the hauler should be prepared in the following manner:

1. Vehicles and containers must be sufficiently cleaned so as to be safe to inspect,
2. The vehicles and containers shall be located at a safe work location as identified on the application for inspection (unless other arrangements have been made with the CHP),
3. Covers or lids should be open and personnel available to operate or disassemble equipment,
4. Every vehicle to be certified must have the name or trademark on each side.
5. Manifests showing the load last transported in each vehicle and container must be available to the inspector, and
6. Maintenance records and driver logs or other timekeeping records as required by the Vehicle Code must be in good order and available to the inspector.

If the above preparations have not been made, the inspector may refuse to inspect thus delaying the renewal of registration in a timely manner.

The Highway Patrol will inspect the documentation of vehicle maintenance, inspection and driver hours. They will inspect the vehicles and containers for conformance with requirements of the Vehicle Code and the Health and Safety Code. If the vehicle was constructed to a Federal Department of Transportation specification or exemption, the documentation of construction, inspections and retesting will be reviewed. If the tank meets a DOT specification or exemption and has been repaired, the repair must be properly documented; and, if welding was necessary, a certified welder should have performed the work (A.S.M.E. Code weld repairs must be performed by a welder certified according to A.S.M.E. Code).

Tanks and containers which were not built to a specification or exemption will be inspected for integrity and proper condition.

NOTICE

Failure to submit a copy of the vehicle registration or DMV Interim Transaction or a lease agreement if the vehicles are leased will result in a delay in the processing of your Application for Vehicle/Container Inspection (Form DHS 8025). Section 66428(a)(1)B of Title 22, California Administrative Code, requires that each vehicle be registered to the applicant or under a written lease. The Department will verify with the Department of Motor Vehicles the registrations of all vehicles listed on Form DHS 8025 for which a valid registration or lease agreement are not submitted.

Form DHS 8025

E-2

APPLICATION FOR VEHICLE/CONTAINER INSPECTION ☐

APPLICATION FOR VEHICLE/CONTAINER REINSPECTION ☐

Check one

Phone ()

Firm Name Contact Person

Inspection Address Street City Zip

LIST VEHICLES AND CONTAINERS USED TO HAUL HAZARDOUS WASTES

Hauler Registration No.

| Make | Body Type | License or Container Number | Vehicle Fees | Inspection Fees | | | CHP USE ONLY (Cert. No./DOT No.) |
|--|-----------|--------------------------------|-----------------|----------------------|----|------|---|
| | | | | Vehicle or Container | | | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| | | | | \$50 | or | \$25 | |
| TOTAL VEHICLE FEES (Enter here and on EH 187 unless additional vehicle) | | | | | | | TOTAL INSPECTION FEES (Enter here and on EH 187 unless additional vehicle) |

APPLICANT CERTIFICATION

I certify under penalty of perjury that to the best of my knowledge and belief the vehicle(s) and container(s) described above conform to the requirements of Section 66434(b), Title 22, California Administrative Code.

Typed or Printed Name

Signed

Position

Date

CHP USE ONLY

Approval Recommended:

Remarks, if denied:

Signature MCS

Zone

Date

Signature MCS

Zone

Date

E-3

APPENDIX F

INSURANCE REQUIREMENTS

The "Certificate of Insurance," form DHS 8038, should be forwarded to your insurance company or agent for signing. The certificate must be included with the application when mailed.

The certificate must cover the name of the firm being registered. If the firm is doing business under a dba, that name must be shown on the certificate also.

The insurance coverage must equal or exceed the requirements of the General Order No. 100j of the California Public Utilities Commission as required by Section 66428, Title 22, California Administrative Code. The current minimum coverage is as follows:

- a. \$250,000 personal bodily injury, including death, per person, per accident;
- b. \$500,000 personal bodily injury, including death, for more than one person, per accident; and
- c. \$100,000 property damage per accident; OR
- d. A combined single limit in the amount of not less than \$600,000 on account of bodily injuries to, or death of, one or more persons.

NOTE: It may be necessary to send each insurance company a certificate when more than one are used to provide the minimum coverage.

REQUIREMENTS FOR SELF-INSURANCE

1. Certificate of Self-Insurance from the Department of Motor Vehicles, Financial Responsibility Section, with an assigned SI number. DMV contact: George Castain at (916) 732-7561
2. Certificate of Insurance form DHS 8038 signed by an agent of the insurance company which handles the filings for the self-insured firm. This insurance company would be responsible for notifying the Department if the registrant ceased to be self-insured.

CERTIFICATE OF INSURANCE

| | | |
|----------------------------------|---------|------------------------|
| Name of Insured | Address | Phone Number () |
| Name of Insurance Agency/Company | Address | Phone Number () |

COVERAGE IN FORCE (The policies for which this certificate is issued provide insurance, as indicated by "X," for the limits shown for each accident.)

| | | | | | |
|---|-------------------------|--|----|--|----|
| <input type="checkbox"/> PRIMARY INSURANCE | Insurance Policy Number | | | | |
| Insurance Company Name | | Address | | Phone Number () | |
| For bodily injuries to or death of one person | \$ | For bodily injuries to or death of all persons injured or killed (subject to the maximum listed above for bodily injuries to or death of one person) | \$ | For loss or damage to property of others (excluding cargo) | \$ |

| | | | | | |
|---|-------------------------|---------|--|------------------------|----|
| <input type="checkbox"/> PRIMARY INSURANCE—COMBINED SINGLE LIMIT | Insurance Policy Number | | | | |
| Insurance Company Name | | Address | | Phone Number () | |
| For bodily injuries to or death of all persons injured or killed and for loss or damage to property of others (excluding cargo) | | | | | \$ |

| | | | | | |
|--|-------------------------|---------|--|------------------------|----|
| <input type="checkbox"/> EXCESS LIABILITY | Insurance Policy Number | | | | |
| Insurance Company Name | | Address | | Phone Number () | |
| For bodily injuries to or death of all persons injured or killed and for loss or damage to property of others (excluding cargo) for amounts in excess of the primary insurance shown above | | | | | \$ |

CANCELLATION:

The insurance policies for which this certificate is issued are effective until canceled and may not be canceled until the Company has given ten (10) days notice in writing to the Toxic Substances Control Division of the California Department of Health Services at its office, 714 P Street, Sacramento, California 95814. Said ten (10) days to commence to run from the date the notice is actually received in the office of the Toxic Substances Control Division.

The certificate of insurance is filed with the Department of Health Services of the State of California, Toxic Substances Control Division, 714 P Street, Sacramento, CA 95814.

CERTIFICATION

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. The policies described herein provide Automobile Bodily Injury Liability and Property Damage Liability protection required for haulers of hazardous waste pursuant to the California Administrative Code, Title 22, Division 4, Chapter 30, "Minimum Standards for Management of Hazardous Wastes" with respect to the operation, maintenance, or use of any vehicle for which registration to haul hazardous waste is required by the Department of Health Services of the State of California, regardless of whether such vehicles are specifically described in the policy or not.

| | | |
|--|------------------------|------|
| Name of Person Signing (Print or Type) | Title | |
| Signature | Phone Number () | Date |

APPENDIX G

UNIFORM HAZARDOUS WASTE MANIFEST

Pursuant to 40 CFR Parts 260, 262, and 271, all regulated shipments of hazardous waste must be accompanied by the Uniform Hazardous Waste Manifest published jointly by the U. S. Environmental Protection Agency (EPA) and the U.S. Department of Transportation (DOT). (Note that this form is different from the California manifest previously in use.) No manifest other than the new Uniform Hazardous Waste Manifest may accompany a shipment of hazardous waste after January 1, 1985.

The new manifest will be provided by the Department upon request. To order, please submit the following information in writing to: Department of Health Services, 714/744 P Street, Sacramento, CA 95814, and place in lower left hand corner of envelope: Attn: "Manifest Orders". Please include your 12-digit EPA identification number, company name and location (street address, city, state, zip code), mailing address, contact person and phone number (include area code), and the number of manifests needed (please estimate on a 12-month basis).

A Continuation Sheet (EPA Form 8700-22A) must be used if (a) more than two transporters are to be used to transport the waste or (b) more space is needed for the DOT description and related information in Item 11 on the manifest. Generators must supply their own Continuation Sheets. To obtain form specifications for printing purposes, please write to the Department at the above address or contact EPA Region 9 (415 974-7472). To order continuation sheets, you may wish to contact Labelmaster at 1-800-621-5308 or J.J. Keller at 1-800-558-5011 or UNZ at 1-800-631-3093.

Upon receipt and prior to use of the new manifest, it is strongly advised that you thoroughly review the completion instructions on the back. Not only is the form different in appearance, but there also have been changes and additions to the codes needed to complete the manifest. Under California law, Section 25189 of the Health and Safety Code, the Department can impose a fine of up to \$25,000 for a violation of the requirement that a hazardous waste manifest be fully and accurately completed. Note the following modifications:

Front of manifest -

- a. The time period within which you are required to forward the appropriate copy of the manifest to the Department has been changed from 15 to 30 days.
- b. Generators must send their copies to:
Department of Health Services
Toxic Substances Control Division
P.O. Box 400
Sacramento, CA 95802
- c. TSD facility operators must send their copies to:
Department of Health Services
Toxic Substances Control Division
P.O. Box 3000
Sacramento, CA 95812

Back of manifest -

- a. Twelve restricted waste categories (#711-751) have been added. Waste categories 711-731, along with 111-113 already on the manifest, encompass the wastes that were restricted from land disposal pursuant to Section 6690, Title 22, California Administrative Code, effective January 22, 1983. The restriction of waste categories 741 and 751 is anticipated in 1985.
- b. A miscellaneous waste category (#612) has been added to be used by local agencies or other organizations which provide collection of household wastes containing hazardous materials, e.g., garden chemicals, cleaning substances, paint. It is the responsibility of the TSD operator to assess disposal fees for such loads based on the fee schedule set forth in the Health and Safety Code, Chapter 268, Section 25174.
- c. Two disposal methods (T01, Tank Treatment, and T02, Treatment Pond) have been added to assist in the manifesting of the restricted wastes, since such wastes must be treated prior to disposal.

For a detailed discussion of the development and use of the Uniform Hazardous Waste Manifest, refer to the Federal Register, Volume 49, Number 55, March 20, 1984 (contact your local library). Copies of the regulation may be obtained by calling EPA Region 9 at the number given above.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

| UNIFORM HAZARDOUS WASTE MANIFEST | | 1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of | Information in the shaded areas is not required by Federal law. | | | |
|---|--|------------------------------|-----------------------|---|---|------------------------|-----------------|--------------|
| 3. Generator's Name and Mailing Address | | | | A.State Manifest Document Number 84864452 | | | | |
| 4. Generator's Phone () | | | | B.State Generator's ID | | | | |
| 5. Transporter 1 Company Name | | 6. US EPA ID Number | | C.State Transporter's ID | | | | |
| 7. Transporter 2 Company Name | | 8. US EPA ID Number | | D.Transporter's Phone | | | | |
| 9. Designated Facility Name and Site Address | | 10. US EPA ID Number | | E.State Transporter's ID | | | | |
| | | | | F.Transporter's Phone | | | | |
| | | | | G.State Facility's ID | | | | |
| | | | | H.Facility's Phone | | | | |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) | | | | 12.Containers No. | Type | 13. Total Quantity | 14. Unit Wt/Vol | I. Waste No. |
| a. | | | | | | | | |
| b. | | | | | | | | |
| c. | | | | | | | | |
| d. | | | | | | | | |
| J. Additional Descriptions for Materials Listed Above | | | | K.Handling Codes for Wastes Listed Above | | | | |
| 15. Special Handling Instructions and Additional Information | | | | | | | | |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. | | | | | | | | |
| Printed/Typed Name | | | | Signature | | Date Month Day Year | | |
| 17. Transporter 1 Acknowledgement of Receipt of Materials | | | | | | Date | | |
| Printed/Typed Name | | | | Signature | | Month Day Year | | |
| 18. Transporter 2 Acknowledgement of Receipt of Materials | | | | | | Date | | |
| Printed/Typed Name | | | | Signature | | Month Day Year | | |
| 19. Discrepancy Indication Space | | | | | | | | |
| 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. | | | | Date | | | | |
| Printed/Typed Name | | | | Signature | | Month Day Year | | |

Instructions For Generators

Item 1. Generator's U.S. EPA ID Number-Manifest Document Number

Enter the generator's U.S. EPA twelve-digit identification number and in the space to the right of this line, enter a five-digit number of your choice.

Item 2. Page 1 of _____

Enter the total number of pages used to complete this Manifest plus the number of Continuation Sheets, if any.

Item 3. Generator's Name and Mailing Address

Enter the name and mailing address of the generator. The address should be the location that will manage the returned Manifest forms.

Item 4. Generator's Phone Number

Enter a telephone number where an authorized agent of the generator may be reached in the event of an emergency.

Item 5. Transporter 1 Company Name

Enter the company name of the first transporter who will transport the waste.

Item 6. U.S. EPA ID Number

Enter the U.S. EPA twelve-digit identification number of the first transporter identified in Item 5.

Item 7. Transporter 2 Company Name

If applicable, enter the company name of the second transporter who will transport the waste. If more than two transporters are used to transport the waste, use a Continuation Sheet(s) and list the transporters in the order they will be transporting the waste.

Item 8. U.S. EPA ID Number

If applicable, enter the U.S. EPA twelve-digit identification number of the second transporter identified in Item 7.

Item 9. Designated Facility Name and Site Address

Enter the company name and site address of the facility designated to receive the waste listed on this Manifest. The address must be the site address which may differ from the company mailing address.

Item 10. U.S. EPA ID Number

Enter the U.S. EPA twelve-digit identification number of the designated facility identified in Item 9.

Item 11. U.S. DOT Description

Enter the U.S. DOT Proper Shipping Name, Hazard Class, and ID Number (UN/NA) for each waste as identified in 49 CFR 171 through 177.

Item 12. Containers (No. and Type)

Enter the number of containers for each waste and the appropriate abbreviation from Table I (below) for the type of container.

Table I — Types of Containers

| | |
|----|---|
| DM | = Metal drums, barrels, kegs |
| DW | = Wooden drums, barrels, kegs |
| DF | = Fiberboard or plastic drums, barrels, kegs |
| TP | = Tanks, portable |
| TT | = Cargo tanks (tank trucks) |
| TC | = Tank cars |
| DT | = Dump truck |
| CY | = Cylinders |
| CM | = Metal boxes, cartons, cases (including roll-offs) |
| CW | = Wooden boxes, cartons, cases |
| CF | = Fiber or plastic boxes, cartons, cases |
| BA | = Burlap, cloth, paper or plastic bags |

Item 13. Total Quantity

Enter the total quantity of waste described on each line.

Item 14. Unit (Wt./Vol.)

Enter the appropriate abbreviation from Table II (below) for the unit of measure.

Table II — Units of Measure

| | |
|---|--------------------------|
| G | = Gallons (liquids only) |
| P | = Pounds |
| T | = Tons (2000 lbs.) |
| Y | = Cubic yards |
| L | = Liters (liquids only) |
| K | = Kilograms |
| M | = Metric tons (1000 kg) |
| N | = Cubic meters |

Item 15. Special Handling Instructions and Additional Information

Generators may use this space to indicate special transportation, treatment, storage, or disposal information or Bill of Lading information. For international shipments, generators must enter in this space the point of departure (City and State) for those shipments destined for treatment, storage, or disposal outside the jurisdiction of the United States.

Item 16. Generator's Certification

The generator must read, sign (by hand), and date the certification statement. If a mode other than highway is used, the word "highway" should be lined out and the appropriate mode (rail, water, or air) inserted in the space below. If another mode in addition to the highway mode is used, enter the appropriate additional mode (e.g., and rail) in the space below.

Instructions For Transporters

Item 17. Transporter 1 Acknowledgement of Receipt of Materials

Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Item 18. Transporter 2 Acknowledgement of Receipt of Materials

Enter, if applicable, the name of the person accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

Note—International Shipments—Transporter Responsibilities.

Exports—Transporters must sign and enter the date the waste left the United States in item 15 of Form 8700-22.

Imports—Shipments of hazardous waste regulated by RCRA and transported into the United States from another country must upon entry be accompanied by the U.S. EPA Uniform Hazardous Waste Manifest. Transporters who transport hazardous waste into the United States from another country are responsible for completing the Manifest (40 CFR 263.10(c)(1)).

Instructions for Owners or Operators of Treatment, Storage, or Disposal Facilities:

Item 19. Discrepancy Indication Space

Refer to 40 CFR 264.72 and 265.72 for help in completing this part. In this space you must note any significant discrepancy between the waste described on the manifest and the waste you actually received. If you cannot resolve significant discrepancy within **45 days** of receiving the waste, you must submit a letter to your DHS Regional Administrator describing the discrepancy and your attempts to reconcile it. A copy of the manifest at issue must be enclosed with the letter.

Item 20. Facility Owner or Operator:

Certification of Receipt of Hazardous Materials Covered by This Manifest Except as Noted in Item 19

Print or type the name of the person accepting the waste on behalf of the owner or operator of the facility. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt.

CALIFORNIA REQUIRED ITEMS

- C. State Transporter's ID
Generator — Enter the certificate of compliance number of the vehicle used to transport the hazardous waste.
- E. State Transporter's ID
If applicable, enter the certificate of compliance number of the second vehicle used to transport the hazardous waste.
- G. State Facility's ID
Operator of TSDF — Enter EPA ID number.
- I. Waste Number
Generator — Enter waste category number. Select appropriate number from Table III. Review entire table before selecting a number. Do not fill in handling code(s).
- J. Additional Descriptions For Materials Listed Above
Generator — Enter chemical composition for each waste category. List components corresponding to the waste category entered.
- K. Handling Codes for Wastes Listed Above
Operator of TSDF — Enter waste handling code(s). Select appropriate code(s) from Table IV.

Restricted Wastes

| | |
|------|---|
| 711. | Liquids with cyanides ≥ 1000 Mg./L |
| 721. | Liquids with arsenic ≤ 500 Mg./L |
| 722. | Liquids with cadmium ≥ 100 Mg./L |
| 723. | Liquids with chromium (VI) ≥ 500 Mg./L |
| 724. | Liquids with lead ≥ 500 Mg./L |

Table III

| | |
|------|--|
| 725. | Liquids with mercury ≥ 20 Mg./L |
| 726. | Liquids with nickel ≥ 134 Mg./L |
| 727. | Liquids with selenium ≥ 100 Mg./L |
| 728. | Liquids with thallium ≥ 130 Mg./L |
| 731. | Liquids with polychlorinated biphenyls ≥ 50 Mg./L |

| | |
|------|--|
| 741. | Liquids with halogenated organic compounds ≥ 1000 Mg./L |
| 751. | Solids or sludges with halogenated organic compounds ≥ 1000 Mg./Kg. |
| 791. | Liquids with pH ≤ 2 |

Nonrestricted Wastes

Inorganics

| | |
|------|---|
| 111. | Acid solution 2 \leq pH \leq 7 with metals (antimony, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, mercury, molybdenum, nickel, selenium, silver, thallium, vanadium, and zinc) |
| 112. | Acid solution without metals |
| 113. | Unspecified acid solution |
| 121. | Alkaline solution (pH ≥ 12.5) with metals (see 111.) |
| 122. | Alkaline solution without metals |
| 123. | Unspecified alkaline solution |
| 131. | Aqueous solution (2 \leq pH \leq 12.5) containing reactive anions (azide, bromate, chlorate, cyanide, fluoride, hypochlorite, nitrite, perchlorate, and sulfide anions) |
| 132. | Aqueous solution with metals (see 111.) |
| 133. | Aqueous solution with total organic residues 10 percent or more |
| 134. | Aqueous solution with total organic residues less than 10 percent |
| 135. | Unspecified aqueous solution |
| 141. | Off specification, aged, or surplus inorganics |
| 151. | Asbestos-containing waste |
| 161. | FCC waste |
| 162. | Other spent catalyst |
| 171. | Metal sludge (see 111.) |
| 172. | Metal dust (see 111.) and machining waste |

| | |
|-----------------|---|
| 181. | Other inorganic solid waste |
| Organics | |
| 211. | Halogenated solvents (chloroform, methyl chloride, perchloroethylene, etc.) |
| 212. | Oxygenated solvents (acetone, butanol, ethyl acetate, etc.) |
| 213. | Hydrocarbon solvents (benzene, hexane, Stoddard, etc.) |
| 214. | Unspecified solvent mixture |
| 221. | Waste oil and mixed oil |
| 222. | Oil/water separation sludge |
| 223. | Unspecified oil-containing waste |
| 231. | Pesticide rinse water |
| 232. | Pesticides and other waste associated with pesticide production |
| 241. | Tank bottom waste |
| 251. | Still bottoms with halogenated organics |
| 252. | Other still bottom waste |
| 261. | Polychlorinated biphenyls and material containing PCBs |
| 271. | Organic monomer waste (includes unreacted resins) |
| 272. | Polymeric resin waste |
| 281. | Adhesives |
| 291. | Latex waste |
| 311. | Pharmaceutical waste |
| 321. | Sewage sludge |
| 322. | Biological waste other than sewage sludge |
| 331. | Off-specification, aged, or surplus organics |

| | |
|------|---|
| 341. | Organic liquids (nonsolvents) with halogens |
| 342. | Organic liquids with metals (see 111.) |
| 343. | Unspecified organic liquid mixture |
| 352. | Organic solids with halogens |
| 352. | Other organic solids |

Sludges

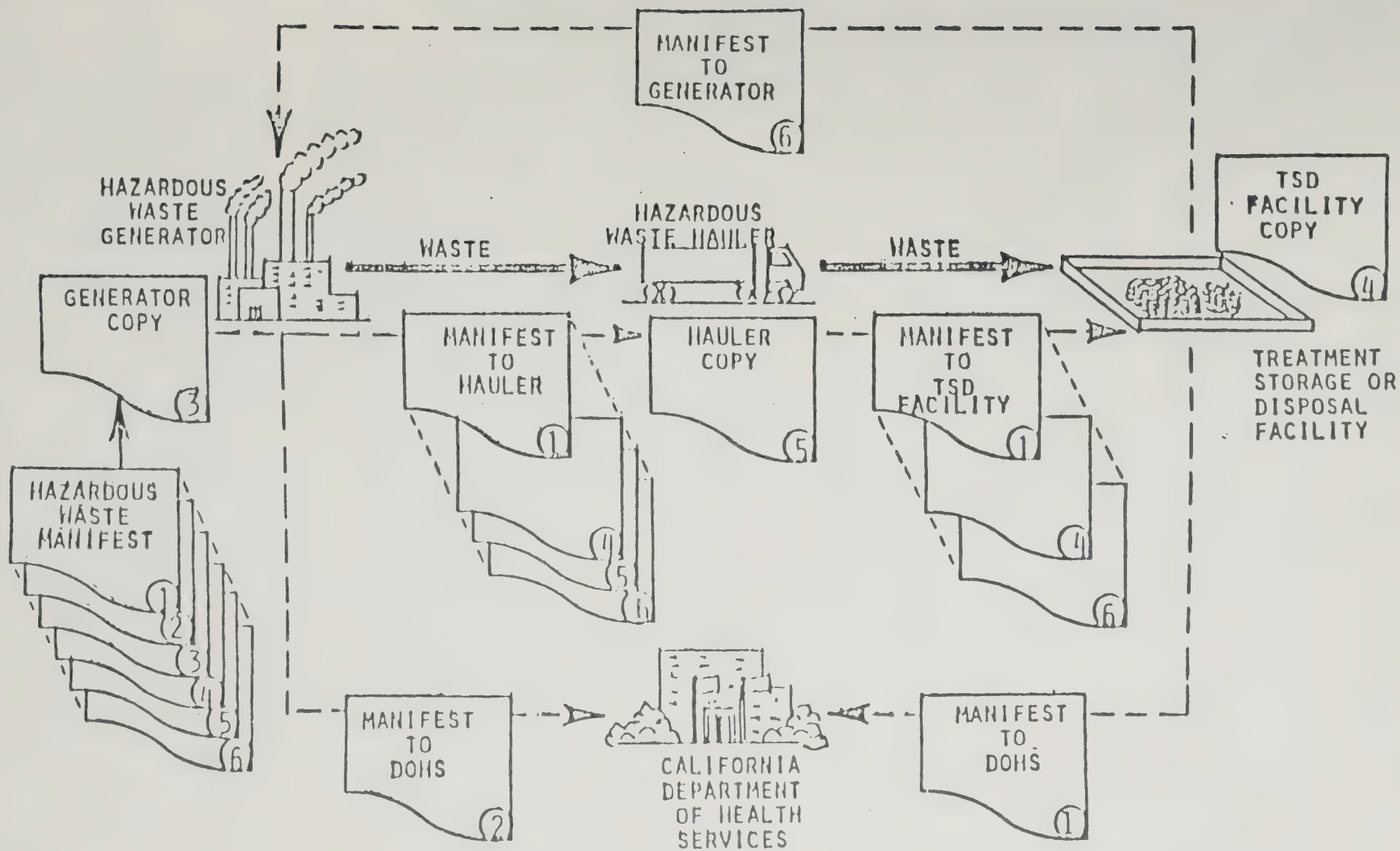
| | |
|------|--------------------------|
| 411. | Alum and gypsum sludge |
| 421. | Lime sludge |
| 431. | Phosphate sludge |
| 441. | Sulfur sludge |
| 451. | Degreasing sludge |
| 461. | Paint sludge |
| 471. | Paper sludge/pulp |
| 481. | Tetraethyl lead sludge |
| 491. | Unspecified sludge waste |

Miscellaneous

| | |
|------|--|
| 511. | Empty pesticide containers 30 gal. or more |
| 512. | Other empty containers 30 gallons or more |
| 513. | Empty containers less than 30 gallons |
| 521. | Drilling Mud |
| 531. | Chemical toilet waste |
| 541. | Photochemicals/photoprocessing waste |
| 551. | Laboratory waste chemicals |
| 561. | Detergent and soap |
| 571. | Fly ash, bottom ash, and retort ash |
| 581. | Gas scrubber waste |
| 591. | Baghouse waste |
| 611. | Contaminated soil |
| 612. | Household wastes |

Table IV

| | | | | | |
|----|------------------------|----|---------------------------|----|--------------------------|
| 01 | Recycle (R01) | 06 | Surface Impoundment (D83) | 10 | Stabilization Pond (T76) |
| 02 | Injection Well (D79) | 07 | Thermal Treatment (T03) | 14 | Transfer Station (H01) |
| 03 | Landfill (D80) | | (include incineration) | 15 | Tank Treatment (T01) |
| 04 | Land Application (D41) | 08 | Neutralization (T31) | 16 | Treatment Pond (T02) |
| 05 | Ocean Disposal (D82) | 09 | Filtration (T47) | 99 | Other (D99) |



CALIFORNIA'S HAZARDOUS WASTE MANIFEST SYSTEM

APPENDIX I
HAZARDOUS WASTES RESTRICTED FROM LANDFILLS IN CALIFORNIA

The following liquid hazardous wastes have been restricted from land disposal:

- A. Liquid hazardous wastes containing the following dissolved metals (or elements) or compounds of these metals (or elements) at concentrations greater than or equal to those specified below:

| | |
|---|----------|
| Arsenic and/or compounds (as As) | 500 mg/l |
| Cadmium and/or compounds (as Cd) | 100 mg/l |
| Chromium (VI) and/or compounds (as CR ^{VI}) | 500 mg/l |
| Lead and/or compounds (as Pb) | 500 mg/l |
| Mercury and/or compounds (as Hg) | 20 mg/l |
| Nickel and/or compounds (as Ni) | 134 mg/l |
| Selenium and/or compounds (as Se) | 100 mg/l |
| Thallium and/or compounds (as Ti) | 130/mg/l |

- B. Liquid hazardous wastes having a pH less than or equal to two (2.0)
- C. Liquid hazardous wastes containing free cyanides at concentrations greater than or equal to 1,000 mg/l

The regulations restrict only liquid hazardous wastes as described above. This is because liquid hazardous waste has a much greater mobility in a landfill environment than solid waste, thus posing a greater threat of producing leachate and affecting water quality.

Wastes which are all liquid are restricted only if the concentrations in the liquid phase exceeds the limits noted above. Wastes which are all solid are not subject to the landfill restrictions at this time. However, wastes which contain liquids and solids (sludges) are more difficult to classify. The Environmental Protection Agency (EPA) has addressed this question by relying on the concept of "free liquids." Under EPA testing protocols, a 100 ml representative sample of the waste is to be placed in a 400-micron conical paint filter for 5 minutes. This filter is to be supported on a ring stand with a beaker below the funnel to capture any free liquid that passes through the filter. If any amount of free liquid passes through the filter within the five-minute period and contains dissolved compounds above the specified concentrations, the waste will be considered as a restricted hazardous waste.

NOTE: The Regional Offices of the Toxic Substances Control Division can provide you with up-to-date lists of haulers, recyclers and facilities and copies of the California Waste Exchange. These offices can also provide you with copies of the state laws and regulations on hazardous waste. If you have any questions, please contact your Regional Office. Addresses and telephone numbers are given on the following page.

HAULER VARIANCE -- DRAIN OIL

(F)TSC-1 - 1

Revised 8/31/84

GEORGE DEUKMEJIAN, Governor

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY

DEPARTMENT OF HEALTH SERVICES

714/744 P STREET
SACRAMENTO, CA 95814

(Date)

XX
XX
XX
XX

Dear _____:

_____ is granted a variance from manifest requirements in accordance with Section 66310, Title 22, of the California Administrative Code (CAC). This variance is limited to the manifesting of drain oil (drain oil is a lubricating fluid which has been removed from an engine crankcase, transmission, gearbox, or differential of an automobile, truck, bus, vessel, plane, heavy equipment, or machinery powered by an internal combustion engine, which does not contain any other hazardous waste as defined by Section 25117 of the Health and Safety Code) and is subject to the following conditions:

1. A copy of this variance and a copy of the hazardous waste hauler permit shall be carried in the vehicle used to transport the above-mentioned hazardous waste.
2. This variance may be canceled by the Department at any time and shall expire when the hazardous waste transporter registration expires on _____. This variance does not relieve the grantee from compliance with other applicable sections of the Hazardous Waste Control Act and the regulations adopted thereunder.
3. The above-mentioned hazardous waste shall be transported in accordance with the Vehicle Code, the regulations of the California Highway Patrol (Title 13, CAC), the regulations of the Department of Transportation (Title 49, Code of Federal Regulations), and the regulations of the Environmental Protection Agency (EPA) (Title 40, Code of Federal Regulations).
4. A hazardous waste manifest, completed pursuant to the following instructions, shall be in the driver's possession when transporting the above-mentioned hazardous waste. A new manifest shall be completed whenever the driver changes, transport vehicles change, or a new day begins. The abbreviated manifesting procedures are as follows:

- a. An EPA identification number is not required for individual generators.
 - b. The transporter shall be responsible for completing both the generator and transporter sections of the manifest.
 - c. The transporter's name and EPA identification number shall also be entered in the Generator Information space of the manifest.
 - d. The transporter shall attach legible copies of receipts for the waste picked up to the front of the manifest. The receipts shall be used to determine the total quantity of the waste in the vehicle. After the waste is delivered, the receipts shall be affixed to the transporter's copy of the manifest. The manifest and receipts shall be kept for three years. The receipts shall contain the following information:
 - . Each generating facility's name and address as listed on its business license.
 - . The type and volume or weight of the hazardous waste for each generating facility.
 - . Each generating facility's contact name and telephone number.
 - . The manifest number.
 - e. At the completion of a day, the transporter shall enter the total volume or weight of the waste on the manifest. The total volume or weight shall be the cumulative amount of waste collected from the generators listed on the attached receipts.
 - f. The transporter shall sign and date both generator and transporter sections of the manifest and shall submit the generator copy of the manifest to this Department within 30 days.
 - g. The original and other copies of the manifest shall be submitted to the treatment, storage, or disposal facility (TSDF) operator upon delivery of the load.
 - h. After completion of the TSDF portion, the original manifest shall be submitted to the Department of Health Services within 30 days. The copy of the manifest generally returned to the generator by the TSDF operator shall be returned to the transporter.
5. The transporter shall leave a receipt with the generator for the waste picked up.

6. The hazardous waste shall be transported only to an approved hazardous waste facility.
7. It is the responsibility of the transporter to request, in writing, a renewal of this variance at least 30 days prior to the hazardous waste transporter registration expiration date.

Please contact Kit Davis at (916) 324-2428 if you have any further questions.

Sincerely,

Thomas E. Bailey, Chief
Program Management Section
Toxic Substances Control Division

cc: Mr. Dave Woods
Motor Carrier Section
California Highway Patrol
P. O. Box 898
Sacramento, CA 95805

Mr. James Allen, Chief
Northern California Section
Department of Health Services
4250 Power Inn Road
Sacramento, CA 95826

Mr. Dwight Hoenig, Chief
North Coast Section
Department of Health Services
2151 Berkeley Way
Berkeley, CA 94704

Mr. Angelo Bellomo, Chief
Southern California Section
Department of Health Services
107 South Broadway, Room 7128
Los Angeles, CA 90012

KD: /(F)TSC-1

APPENDIX K

LIABILITY WAIVER (DISCLAIMER)

I, the undersigned participant, intending to be legally bound, waive and release and forever discharge any and all rights and/or claims, and further agree to indemnify and hold harmless (sponsoring Agency), and its contractors, sub-contractors, volunteers, Board members, additional sponsors and contributors for any and all injuries and damages suffered by me that occurred during or as a result of the HHW Project.

[illegible]

APPENDIX L

AMENDMENT TO THE ENVIRONMENTAL MANAGEMENT PLAN

By resolution of the ABAG Executive Board on September 19, 1985, Action 13.8 was added to the Solid Waste Management Plan. (See Table 6, Chapter V, San Francisco Bay Area Environmental Management Plan [EMP] - Volume 1, by ABAG, June 1978). This action incorporated the Regional Plan for Small Quantity Generators of Hazardous Waste as Appendix P to the EMP. A description of this action and associated environmental impacts are summarized in the following Table. Implementation of this Plan by local agencies is voluntary.

REVISION TO THE SAN FRANCISCO BAY AREA ENVIRONMENTAL MANAGEMENT PLAN

SOLID WASTE MANAGEMENT PLAN

Policy 13. REGULATIONS SHOULD ENSURE SAFE AND PROPER HANDLING OF HAZARDOUS WASTES.

| RECOMMENDATIONS | GENERAL DESCRIPTION | RESPONSIBLE AGENCY (OR AGENCIES) | SCHEDULE FOR ACTION | LEGAL AUTHORITY | TOTAL COST/YEAR OF RECOMMENDED ACTION | PORTION OF TOTAL COST/YR. DIRECTLY ATTRIBUTABLE TO THIS PLAN | FINANCING MECHANISM | MEASURES TO ENSURE IMPLEMENTATION |
|--|---|--|---------------------|--|---|--|---|---|
| Action 13.8 Improve disposal of hazardous waste by household and business small quantity generators, as presented in Appendix P: REGIONAL PLAN FOR SMALL QUANTITY GENERATORS OF HAZARDOUS WASTE | a) Provide collection opportunities for small quantity generators (SQGs) | DHS, CWMB, ABAG, cities, counties and local businesses | Ongoing | Enabling legislation of the agencies. Local resolutions as appropriate | Undetermined (Cost factors include public education, collection, recycling, treatment, disposal and enforcement activities) | Undetermined | Federal and State grants; local funds, user fees | Voluntary for local governments |
| | b) Adopt program to prevent dumping of SQG Hazardous waste into solid waste stream | CWMB, RWQCB, cities, counties, solid waste management agencies | Ongoing | Local resolutions, as appropriate | Undetermined | Undetermined | Local funds | Proper hazardous waste disposal required by existing Statutes |
| | c) Conduct educational campaigns directed at SQGs | EPA, DHS, RWQCB, ABAG, cities, counties, business associations | Ongoing | RCRA, local resolutions, as appropriate | Undetermined | Undetermined | Federal and State grants, local funds and private funds | Voluntary, RCRA |
| | d) Conduct additional studies into the effects of improper disposal of small amounts of hazardous waste | DHS, RWQCB, CWMB, ABAG, colleges, universities and special interest groups | Ongoing | Not applicable | Undetermined | Undetermined | Federal and State grants, and private funds | Voluntary |

| ENVIRONMENTAL IMPACTS | INSTITUTIONAL/FINANCIAL IMPACTS | ECONOMIC IMPACTS | SOCIAL IMPACTS |
|---|--|---|--|
| <u>Air Quality</u> <ul style="list-style-type: none"> o Reduced incidence of air pollution due to improper hazardous waste disposal | <u>Financial</u> Direct Public Costs of Implementation <ul style="list-style-type: none"> o Undetermined. | <u>Production of Goods and Services</u> <ul style="list-style-type: none"> o Employment - Public and private sector job opportunities may result from improved enforcement and new collection programs | <u>Housing Supply</u> <ul style="list-style-type: none"> o No impact |
| <u>Water Quality</u> <ul style="list-style-type: none"> o Reduced incidence of water pollution from improper waste disposal o Reduced incidence of impairment of beneficial uses of Bay Area waters. | Fiscal Effects on Local Governments <ul style="list-style-type: none"> o Local collection and education and enforcement programs may require commitment of local fiscal resources. | <u>Income and Investment</u> <ul style="list-style-type: none"> o New collection and enforcement of waste disposal programs may require private capital investments | <u>Physical Mobility</u> <ul style="list-style-type: none"> o No impact |
| <u>Physical Resources</u> <ul style="list-style-type: none"> o Direct impact on solid waste decreasing illegal disposal. More hazardous waste being recycled, treated and/or disposed of to Class I facilities, which are limited in capacity. Any wastes channeled to recycling operations could reduce demand upon natural resources. | <u>Institutional</u> There would be increased involvement by local governments in the SQG disposal efforts. There would be increased staff commitments to this effort. | <ul style="list-style-type: none"> o Profits of firms bearing costs of new requirements may be affected. Costs of compliance to be passed on to consumer. | <u>Health and Safety</u> <ul style="list-style-type: none"> o Reduced potential for public exposure to health and safety risks |
| <u>Energy</u> <ul style="list-style-type: none"> o Minor changes in pattern of energy consumption. | | <u>Consumer Expenditures</u> <ul style="list-style-type: none"> o Potential for increased prices of goods and services (especially petroleum and chemical based products) may result when disposal costs are passed on to the consumer. This may be offset by lower production costs for recycled materials, especially petroleum products. | <u>Sense of Community</u> <ul style="list-style-type: none"> o No impact |
| <u>Amenities</u> <ul style="list-style-type: none"> o Indirect benefits associated with reduced incidence of illegal storage and disposal. | | | <u>Urban Patterns</u> <ul style="list-style-type: none"> o No impact |
| | | | <u>Equity</u> No impact |

U.C. BERKELEY LIBRARIES



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Oakland, CA 94604**